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*Attorneys for Defendants
Republic Mortgage Insurance Company and
Republic Mortgage Insurance Company of North Carolina*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JPMORGAN CHASE BANK, N.A.,	:	
	:	Case No.: 2:10-CV-06141 (SRC) (MAS)
Plaintiff,	:	
	:	NOTICE OF DEFENDANTS'
v.	:	MOTION TO DISMISS SECOND
	:	AMENDED COMPLAINT AND
REPUBLIC MORTGAGE INSURANCE	:	FOR MORE DEFINITE STATEMENT
COMPANY and REPUBLIC	:	
MORTGAGE INSURANCE COMPANY	:	ORAL ARGUMENT REQUESTED
OF NORTH CAROLINA,	:	
	:	Motion date: December 5, 2011
Defendants.	:	
	:	

TO: **LOWENSTEIN SANDLER PC**
65 Livingston Avenue
Roseland, New Jersey 07068

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New York, New York 10022

Attorneys for Plaintiff JPMorgan Chase Bank, N.A.

PLEASE TAKE NOTICE that on December 5, 2011, or as soon thereafter as counsel may be heard, Defendants Republic Mortgage Insurance Company and Republic Mortgage Insurance Company of North Carolina, by its counsel Cole, Schotz, Meisel, Forman & Leonard, P.A. and Butler Rubin Saltarelli & Boyd LLP, shall move before the Honorable Stanley R. Chesler, U.S.D.J., at the United States District Court for the District of New Jersey, for entry of an Order pursuant to Fed. R Civ. P. 12 dismissing various claims in the Second Amended Complaint with prejudice and requiring Plaintiff to provide a more definite statement of any remaining claims.

PLEASE TAKE FURTHER NOTICE that, in support of its motion, Defendants shall rely upon the accompanying Memorandum of Law and Declaration of Michael R. Hassan.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order granting the motions is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Defendants respectfully request oral argument pursuant to Local Rule 78.1(b) on the return date of the Motion.

Respectfully submitted,

Dated: September 26, 2011

COLE, SCHOTZ, MEISEL, FORMAN &
LEONARD, P.A.

By: s/Michael S. Meisel

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Carolina*

CERTIFICATE OF SERVICE

I, Arianna Frankl, hereby certify under penalty of perjury, that on September 26, 2011, I caused a copy of the foregoing NOTICE OF DEFENDANTS' MOTION TO DISMISS SECOND AMENDED COMPLAINT AND FOR MORE DEFINITE STATEMENT, PROPOSED ORDER and DECLARATION OF MICHAEL R. HASSAN to be served in accordance with Local Rule 5.2 via electronic means through the Court's ECF filing system on all parties who have appeared in the action.

s/Arianna Frankl

Arianna Frankl